



JOHN W. HICKENLOOPER
Mayor

CITY AND COUNTY OF DENVER

DEPARTMENT OF ENVIRONMENTAL HEALTH

Chris Veasey, Ph.D., Manager

SDMS Document ID



2047051

Environmental Protection Division

201 W. Colfax, Dept. 1009

Denver, CO. 80202

PHONE: (720) 865-5452

FAX: (720) 865-5534

www.denvergov.org/environmental-protection

December 17, 2003

Barbara O'Grady
Colorado Department of Public Health and Environment
HMWMD-B2
4300 Cherry Creek Dr. South
Denver, CO 80246-1530

Re: Request for work plan documenting placement of VB/I-70 soils on the Asarco Globe Plant site

Dear Ms. O'Grady:

At the November meeting of the VB/I-70 site working group, we learned that EPA has decided to place soils at the Asarco Globe Plant subsequent to their removal from properties in the VB/I-70 Superfund site. We have expressed several concerns associated with this issue in emails sent to Victor Ketellapper (EPA) and you (cc list), dated September 2 and November 14, 2003 (enclosed).

In recent discussions, Victor and you have separately indicated that many of our previously expressed concerns will be addressed in documentation that will be provided to us in the near future. Our concerns include the need for control of fugitive dusts and storm water runoff, adequate air monitoring, appropriate cutoff criteria for levels of arsenic and lead in the VB soils that would be placed onsite, truck hauling/traffic issues, long-term protectiveness/containment of the VB soils, and appropriate involvement and notification of residents.

However, we lack assurance that one of our expressed concerns is currently being addressed, namely our request that a plan be developed that would document where and how the VB soils will be used on the Globe site and how that action will result in an improvement of conditions for nearby residents. At the October 1st public meeting, we heard several Denver residents express reluctant acceptance of the proposal, on the basis they wished to reduce their long-term health risks by covering currently exposed site soils with the relatively more clean VB soils. Therefore, we respectfully repeat our request for the development of a work plan that documents the beneficial use of the VB soils, and which will ensure that they will be used to cover relatively more contaminated Globe Plant site soils. The work plan should include a prioritization scheme documenting where, and in what order, the VB soils will be used on the site.

Thank you in advance for your consideration in this matter. If you have any questions, please contact Celia VanDerLoop at 720 865-5458, or me at 720 865-5469.

Sincerely,

Gene C. Hook
Environmental Protection Division

Cc:

Bob Little - Asarco

Judy Montero - Denver City Council

Encl.

2003 DEC 29 PM 2:09
EPA
SUPERFUND BRANCH

Hook, Gene C. - Environmental Health

From: Hook, Gene C. - Environmental Health
Sent: Tuesday, September 02, 2003 2:00 PM
To: 'Victor Ketellapper (E-mail)'
Cc: 'Barbara O'Grady'; 'ginny.brannon@state.co.us'; Bosco, Cindy - Environmental Health; Vanderloop, Celia - Environmental Health
Subject: EPA's proposal to place soils from VB/I-70 at the Globe Plant site

Victor,

We understand EPA has proposed, but not made a final decision on, the placement of soils at the Asarco Globe Plant subsequent to their removal from properties in the VB/I-70 site. We have several concerns regarding the use and placement of VB soils at the Globe plant that we believe should be addressed prior to a final decision on the matter.

1. We understand one basis for EPA's proposal is the assertion that the placement of the soils on the Globe Plant site is a beneficial use of the soils that results in an improvement of conditions at the Globe Plant site. We request this assertion be documented in a plan for the site that demonstrates where and how the soils will be used and how conditions at the Globe site will be improved. The plan could be used to present evidence to the community that the soils will be "...managed in a manner that is part of the highly reliable long-term remedy selected for that site...".
2. Regarding the proposal, several Globeville residents have expressed concerns for the potential release of fugitive dusts and the potential for soil runoff from the Globe site during storm events. We request EPA provide interested parties with a workplan that addresses these concerns and presents protocols that will be followed by EPA to prevent the release of soil borne contaminants during all work activities.
3. EPA has suggested the use of a cutoff number for levels of lead and arsenic in the VB soils that would be placed on the Globe site. Soil with levels of lead and/or arsenic above these cutoff values would not be placed on the Globe site, but instead would be hauled to another approved disposal facility. We suggest there is merit in this approach and believe it should be further explored with the input of community members and other interested parties, including DEH.

Thank you for your consideration of our concerns. Please contact me or Celia VanDerLoop (720 865-5458) if you have questions or comments regarding these issues.

Gene

Gene C. Hook
Denver Department of Environmental Health
201 W. Colfax Ave, Dept 1009
Denver, CO 80202
720.865.5469 phone
720.865.5534 fax
gene.hook@ci.denver.co.us

Hook, Gene C. - Environmental Health

From: Hook, Gene C. - Environmental Health
Sent: Friday, November 14, 2003 4:38 PM
To: Victor Ketellapper (E-mail)
Cc: Barbara O'Grady (E-mail); Student, John - Environmental Health; Vanderloop, Celia - Environmental Health
Subject: VB soils to Asarco

Victor,

At yesterday's working group meeting we learned that EPA has decided to place soils at the Asarco Globe Plant subsequent to their removal from properties in the VB/I-70 site. Also, we learned that CDPHE has begun excavation of soils from the former sedimentation pond area on the plant site, as a part of actions proscribed in the consent decree. We raise the following questions so that we can appropriately respond to concerns raised by a member of city council, as well as members of the public. We expressed similar concerns to you in an email dated Sept 2, 2003 (attached).

1. We have heard members of the Globeville community express concern for the potential release of fugitive dusts, especially during work activities onsite, as well as the potential for soil runoff from the Globe plant site during storm events. We had requested EPA provide interested parties with a workplan that addresses these concerns and presents protocols that will be followed by EPA to prevent the release of soil borne contaminants during work activities. The same request applies to onsite work being overseen by CDPHE. What is the status of this workplan? What protocols are being followed in the field to ensure that these concerns are adequately addressed?
2. During the Oct 1st public meeting in Globeville, EPA stated their willingness to provide air monitoring to address community concerns for the release of contaminants in fugitive dusts, during onsite work activities. At yesterday's meeting, you stated that EPA and CDPHE were currently performing air monitoring to address these concerns. We request EPA and CDPHE provide DEH and other interested parties with the protocols for the monitoring effort, as well as relevant results when they become available.
3. At the Oct. 1st public meeting in Globeville, I recall that a number of residents expressed their reservations about the project and requested an additional meeting and feedback from CDPHE and EPA regarding their concerns. After Oct 1st, were those individuals provided with another opportunity to meet with EPA or CDPHE and was there an additional attempt to address their concerns?
4. At the Oct 1st public meeting and again yesterday, you stated that EPA will sample VB soils before they are placed on the Asarco plant site, and haul them to an approved alternate disposal site if the soils exceed certain criteria. However, those criteria have not been publicly defined. We request those criteria be publicly defined with the input of interested parties, including DEH.

Thank you for your consideration of our concerns. Please contact me or Celia VanDerLoop (720 865-5458) if you have questions or comments regarding these issues.

Gene



EPA's proposal to
place soils ..

Gene C. Hook